

July 13, 2017

Mr. Steven Renninger On-Scene Coordinator U.S. Environmental Protection Agency Region 5 77 W. Jackson Boulevard Chicago, Illinois 60604

Subject: Final Removal Assessment Report

Lunkenheimer Foundry Site EPA Contract No. EP-S5-13-01

Technical Direction Document No. 0001-1703-005

Document Tracking No. 1628

Dear Mr. Renninger:

Tetra Tech Inc. (Tetra Tech) is submitting the Final Removal Assessment Report for the Lunkenheimer Foundry Site. This draft letter report summarizes sampling activities conducted on April 25, 2017, and presents analytical results obtained through these sampling efforts. Additional efforts at this site may continue at your discretion. If additional activities are conducted, they will be summarized and results will be presented as an addendum to this report.

If you have any questions regarding this report, please call me at (262) 227-1049

Sincerely,

Karl Schultz Project Manager

Enclosure

cc: Kevin Scott, Tetra Tech Program Manager

TDD File

FINAL REMOVAL ASSESSMENT REPORT LUNKENHEIMER FOUNDRY SITE CINCINNATI, HAMILTON COUNTY, OHIO

Prepared for

U.S. Environmental Protection Agency

Emergency Response Branch Region 5 77 W. Jackson Boulevard Chicago, IL 60606

Submitted by

Tetra Tech Inc. 1 South Wacker Drive, 37th Floor Chicago, IL 60606

EPA Contract No. EP-S5-13-01

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July 13, 2017

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1.0 INTRODUCTION

Under the Superfund Technical Assessment Response Team (START) Contract No. EP-S5-13-01, Technical Directional Document (TDD) No. 0001-1703-005, the U.S. Environmental Protection Agency (EPA) tasked Tetra Tech Inc. (Tetra Tech) to perform a removal assessment for the Lunkenheimer Foundry facility in Cincinnati, Ohio (Figure 1). The purpose of the site assessment was to document and characterize site conditions from the discovery of numerous orphaned drums and containers, drums and piles of foundry sand, and transformers labeled as containing polychlorinated biphenyl (PCB) oil. Tetra Tech was also tasked with the following activities:

- Develop and implement a site specific Health and Safety Plan and a Sampling and Analysis Plan
- Collect samples from unknown drums, piles of foundry sand, and PCB oil containing transformers
- Procure analytical services from a laboratory
- Perform validation of analytical data results from sampling activities
- Track costs related to sampling activities
- Evaluate potential threats posed by the Site to public health and the environment
- Develop a site assessment report of completed activities

This site draft assessment report documents sampling and site activities that took place at the Lunkenheimer Foundry site on April 25, 2017. The report discusses the site description and site background in Section 2.0, describes sampling activities in Section 3.0, provides a summary of analytical results in Section 4.0, provides conclusions in Section 5.0, and includes references in Section 6.0.

In addition, this site draft assessment report contains seven Appendices. Site Figures 1 through 3 are provided in Appendix A; analytical data tables are provided in Appendix B; photographic documentation is provided as Appendix C; field notes recorded by START are provided in Appendix D; laboratory reports are provided in Appendix E; the data validation report is provided in Appendix F; and Tetra Tech's Environmentally Preferred Practices in Appendix G.

2.0 SITE BACKGROUND

This section describes the site location, the site description, and the project.

2.1 SITE LOCATION

The Site is located at 1519 Tremont Street in Cincinnati, Hamilton County, Ohio (Appendix A, Figure 1). The geographical coordinates for the site are 39.126855° North latitude and -84.54927° West longitude. The Site is located on the corner of Beekman Street and Tremont Street with an approximately 150,000 square foot industrial building. The Site building is part of the former Lunkenheimer complex that included numerous manufacturing buildings between Queen City Avenue and Waverly Avenue. The adjacent buildings were formerly a part of the Lunkenheimer complex, but are now being utilized for storage or light manufacturing. There is another former industrial building attached to the foundry to the west, as well as a catwalk connecting the foundry to a former industrial building to the north that is now utilized for commercial use. The site is surrounded by industrial activity to the north and east and by commercial and residential properties to the south and west. The current layout is shown in Figure 2 in Appendix A.

2.2 SITE DESCRIPTION

The Site is an abandoned foundry building, which consists of a five story, 150,000 square foot factory. The building was constructed in 1908 for the Lunkenheimer Foundry. Lunkenheimer manufactured various bronze, iron, and cast steel valves, utilizing the upper levels of the building as a foundry and the lower levels for storage and machine shop. It is unclear when Lunkenheimer ceased operations. From approximately 2009 until January 2017, the Cincinnati Valve Company (CVC) operated the Site building. CVC produced Lunkenheimer branded valves under a licensing agreement. During the period of CVC operation, the Star-Lett Corporation owned the Site building. The Site includes a 1.5-acre parcel property with an abandoned manufacturing building. The Site is currently vacant, with visual evidence of frequent trespassing and broken windows.

Throughout the building there are a number of orphaned containers containing unknown chemicals, empty containers, and piles/drums of foundry sand. On the ground floor, START discovered one metal drum with a corrosive label on it, several containers with flammable liquid stickers on them, and numerous unmarked 55-gallon drums. On the first floor, an abandoned lab was discovered that contained numerous unmarked containers and glassware, some of which contained liquid. Numerous acid and solvent containers were also located in the lab, labels included Hydrochloric Acid, Acetone, Ether,

Benzene, and Ethyl Acetate. START and EPA did not find anything of concern on the second floor. On the third floor, there are fiberboard drums of powder labeled as corrosive; the drums are in a state of deterioration and the powder has begun to spill out from the containers. There are also numerous piles of, and 55 gallon drums containing, foundry sand. START discovered capacitors and transformers labeled as containing PCBs on the fourth floor of the building, adjacent to the foundry area. Approximately 600 drums were documented in the Site building. There are four underground storage tanks (USTs) located under the sidewalk adjacent to Beekman Street which contain heating oil. USTs appear to be full, and when there is severe storms the USTs have had oil overflowing into the Beekman Street storm drain and nearby Mill Creek.

3.0 SITE ACTIVITIES

On March 27th, 2017, the Cincinnati Fire Department requested EPA's assistance to conduct an assessment and a potential emergency removal action at the Lunkenheimer Foundry Site. On March 28th, 2017, Cincinnati Fire Department, Ohio EPA, Cincinnati Metropolitan Sewer District, and EPA On-Scene Coordinator Steve Renninger toured the Lunkenheimer Site with representatives of both Taft Stettinius & Hollister LLP and TRC Solutions. Taft Stettinius & Hollister LLP is the law firm that represents the property owner and TRC Solutions is the law firm's environmental consultant. The following wastes were documented in the vacant Site building: PCB transformers, numerous piles of foundry sand, drums of metals waste, unknown drums and containers, corrosive waste, and ignitable waste. On April 11th, 2017, the Tetra Tech START project manager and EPA On-scene Coordinator (OSC) met on site to complete an initial site walkthrough. During this site walkthrough, Tetra Tech and EPA were accompanied by representatives from both Taft Stettinius & Hollister LLP and TRC Solutions. The site walkthrough focused on identifying potential sampling locations for the collection of unknown container samples, foundry sand samples and bulk oil samples. During the initial site walkthrough approximately 600 orphaned 55-gallon drums were observed throughout the building. Two fiberboard drums labeled as "corrosive" were found on the third floor in a deteriorated state with powder-like contents spilling onto the floor. An open top fiberboard drum containing powder and labelled as an "oxidizer" was also observed on the third floor. A 25 gallon steel drum labelled as "corrosive" was observed in the basement of the building. Throughout the building, foundry sand was found in piles on the floor, covering machinery, and found in hundreds of open top 55 gallon drums. Field screening was conducted by EPA START and with the use of an x-ray fluorescence (XRF) handheld analyzer, piles of foundry sand were found to have levels of lead as high as 38,800 parts per million (ppm). On the fourth floor of the building, four large transformers were observed. Two of the transformers were labelled as "contains PCBs" and two of the transformers were not labelled. Potential unknown container samples were based on container labels such as "corrosive" or "oxidizer" and location. Potential sampling locations for foundry sand were based on field screening results with the XRF handheld analyzer. Potential bulk PCB oil sample locations were based on the "contains PCB" labels, which were observed on the transformers on the fourth floor.

On April 25, 2017, Tetra Tech and EPA conducted multimedia sampling at the Site. Tetra Tech and EPA were accompanied by representatives of both Taft Stettinius & Hollister LLP and TRC Solutions. Further details on sampling activities and sample management activities are presented in Sections 3.1 and 3.2.

3.1 SAMPLING ACTIVITIES

Tetra Tech and EPA met on site on April 25, 2017, to collect multimedia samples to document site conditions and characterize the Site and the threat it poses to human health and the environment. Tetra Tech and EPA were accompanied by representatives of both Taft Stettinius & Hollister LLP and TRC Solutions. Tetra Tech and EPA conducted a site walkthrough prior to beginning sampling to identify final sampling locations. Tetra Tech and EPA identified 25 sampling locations at the Site; 10 liquid waste, 12 solid waste (including 3 duplicate samples), 4 foundry sand, and 2 bulk oil samples were collected. The sampling locations are shown in Figure 3 in Appendix A. Table 1 presents the sample identifiers, matrices, and sampling locations.

TABLE 1 SAMPLE SUMMARY

Sample Identifier	Matrix	Floor	Analytical
LFS-BO-001-042517	Bulk Oil	4	PCBs
LFS-BO-002-042517	Bulk Oil	4	PCBs
LFS-FS-001-042517	Foundry Sand	3	TCLP Metals
LFS-FS-002-042517	Foundry Sand	3	TCLP Metals
LFS-FS-003-042517	Foundry Sand	4	TCLP Metals
LFS-FS-004-042517	Foundry Sand	4	TCLP Metals
LFS-LW-001-042517	Liquid Waste	G	рН
LFS-LW-002-042517	Liquid Waste	G	Flashpoint
LFS-LW-003-042517	Liquid Waste	G	Flashpoint
LFS-LW-004-042517	Liquid Waste	G	Flashpoint
LFS-LW-005-042517	Liquid Waste	3	рН
LFS-LW-006-042517	Liquid Waste	4	Flashpoint
LFS-LW-007-042517	Liquid Waste	1 (Lab)	pH
LFS-LW-008-042517	Liquid Waste	1 (Lab)	pH
LFS-LW-009-042517	Liquid Waste	1 (Lab)	Flashpoint
LFS-LW-010-042517	Liquid Waste	1 (Lab)	Flashpoint
LFS-SW-001-042517	Solid Waste	3	pH
LFS-SW-001-042517-DUP	Solid Waste	3	pH

Sample Identifier	Matrix	Floor	Analytical
LFS-SW-002-042517	Solid Waste	3	pН
LFS-SW-003-042517	Solid Waste	3	pН
LFS-SW-004-042517	Solid Waste	3	TCLP Metals
LFS-SW-004-042517-DUP	Solid Waste	3	TCLP Metals
LFS-SW-005-042517	Solid Waste	4	TCLP Metals
LFS-SW-006-042517	Solid Waste	4	TCLP Metals
LFS-SW-008-042517	Solid Waste	4	TCLP Metals
LFS-SW-008-042517-DUP	Solid Waste	4	TCLP Metals
LFS-SW-009-042517	Solid Waste	4	TCLP Metals
LFS-SW-007-042517	Solid Waste	4	Waste dilution for Metals

BO Bulk Oil

DUP Duplicate Sample FS Foundry Sand

LFS Lunkenheimer Foundry Site

LW Liquid Waste

PCB polychlorinated Biphenyls

SW Solid Waste

TCLP Toxicity characteristic leaching procedure

3.1.1 Liquid Waste Samples

A total of ten liquid waste samples were collected. six out of ten liquid waste samples collected were analyzed for flashpoint. Four out of ten liquid waste samples collected were analyzed for pH. No duplicate samples were collected from liquid waste samples due to a limited quantity. Liquid waste analytical results can be found in Section 4.1.

3.1.2 Solid Waste Samples

A total of 12 solid waste samples were collected. Four out of 12 solid waste samples collected were analyzed for pH. Eight out of 12 solid waste samples collected were analyzed for toxicity characteristic leaching procedure (TCLP) metals. Three duplicate samples were collected (1 for pH and 2 for TCLP metals) from solid waste samples due to highly elevated field screening readings. Solid waste analytical results can be found in Section 4.2.

3.1.3 Foundry Sand Samples

A total of four foundry samples were collected and analyzed for TCLP metals. No duplicate samples were collected from foundry sand samples. Foundry sand analytical results can be found in Section 4.3.

3.1.4 Bulk PCB Oil Samples

A total of two bulk oil samples were collected. These samples were collected from the two transformers that were unlabeled. The two transformers that were labeled as "contains PCBs" could not be safely opened by sample personnel, so they were not sampled. Both bulk oil samples collected were analyzed for PCBs. No duplicate samples were collected from bulk oil samples due to difficulty accessing the bulk oil. Bulk oil analytical results can be found in Section 4.4.

3.2 SAMPLE COLLECTION METHODS AND ANALYSIS

Due to the unknown nature of the materials in closed and unlabeled drums and their associated hazards, all samples of unknown containers were collected in Level B personal protective equipment. All liquid and bulk materials were collected directly from the original container and contents were transferred directly into laboratory cleaned and certified bottleware. All liquid waste samples and PCB bulk oil samples were collected from their container or drum using a dedicated drum thief or COLIWASA. Samples were transferred from the drum thief or COLIWASSA directly into laboratory cleaned and certified bottleware for analysis of corrosivity, flash point, or PCB content. The samples were collected in accordance with Tetra Tech SOP NO.008-2 "Containerized Liquid, Sludge, and Slurry Sampling" (Tetra Tech 2000). The foundry sand, and solid waste samples were collected using dedicated plastic

scoops. Samples were transferred from the plastic scoops into cleaned and certified bottleware. The foundry sand was analyzed for TCLP metals and the solid waste samples were analyzed for pH or TCLP metals. The solid samples were collected in accordance with Tetra Tech SOP NO. 007-2 "Bulk Materials Sampling" (Tetra Tech 1999).

3.3 SAMPLE MANAGEMENT

All samples collected during this sampling event were handled and packaged in accordance with the Tetra Tech "Quality Assurance Project Plan (QAPP) for START" (Tetra Tech 2016). All shipping containers were properly labeled with chain-of-custody seals and were delivered with signed chain-of-custody forms (Appendix E) and appropriate hazard warnings for laboratory personnel. In addition, Tetra Tech photographed the sites and documented activities in a logbook in accordance with Tetra Tech SOP No. 024, "Recording of Notes in Field Logbook" (Tetra Tech 2008), and Tetra Tech's QAPP for START (Tetra Tech 2016).

All multimedia samples collected from the site, including quality assurance and quality control (QA/QC) samples, were shipped to CT Laboratories, 1230 Lange Court, Baraboo, WI 53913.

4.0 ANALYTICAL RESULTS

Tetra Tech reviewed all multimedia sampling results. Results are summarized in the Data Summary Tables 1 and 2 provided in Appendix B. The validated Level IV analytical data packages, including signed chain of custody forms, are provided in Appendix E, and the data validation report is provided in Appendix F.

4.1 LIQUID WASTE RESULTS

A total of ten liquid waste samples were collected. Four out of ten liquid waste samples collected were analyzed for pH. Six out of ten liquid waste samples collected were analyzed for flashpoint.

4.1.1 pH of Liquid Waste Samples

According to Code of Federal Regulations (C.F.R.) 261.22, liquid waste having a pH level less than 2.0 standard units (SU) or greater than 12.5 SU characterizes that liquid waste as hazardous waste for corrosivity (D002). Three out of four liquid waste samples analyzed for pH verified the characteristic of a hazardous waste for corrosivity (D002). LFS-LW-001 (pH = 14) documented liquid waste having a pH greater than 12.5 SU. LFS-LW-007 (pH = <0.1) and LFS-LW-008 (pH = <0.1) documented liquid waste having a pH less than 2.0 SU.

4.1.2 Flash Point of Liquid Waste Samples

According to C.F.R. 261.22, liquid waste having a flashpoint less than 140°F characterizes that liquid waste as hazardous waste for ignitability (D001). Two out of six liquid waste samples analyzed for flashpoint verified the characteristic of a hazardous waste for ignitability (D001). LFS-LW-006 (flashpoint = 120.6°F) and LFS-LW-010 (flashpoint = 100.5°F) both documented liquid waste having a flashpoint less than 140°F.

4.2 SOLID WASTE RESULTS

A total of 12 solid waste samples were collected. Four out of 12 solid waste samples collected were analyzed for pH, 7 out of 12 solid waste samples collected were analyzed for TCLP metals, and 1 out of 12 solid waste samples collected were analyzed for metals. The lab indicated one sample (LFS-SW-007) received could not be analyzed for TCLP metals. Email correspondence from CT Laboratories personnel indicated: "We will not be able to perform the TCLP extraction for Sample # 860109 (LFS-SW-007-042517) due to the sample matrix. This sample will be analyzed as a waste dilution for metals and reported in mg/kg units rather than mg/L." Analytical results for sample LFS-SW-007-042517 are presented in Table 2 in Appendix B. Other solid waste sample analytical results are presented in Table 1.

4.2.1 pH of Solid Waste Samples

According to C.F.R. 261.22, solid waste having a pH level less than 2.0 SU or greater than 12.5 SU characterizes that waste as hazardous waste for corrosivity (D002). Three out of three solid waste samples analyzed for pH did not indicate pH below 2.0 SU or above 12.5 SU, which indicates these samples did not verify the characteristic of a hazardous waste for corrosivity.

4.2.2 TCLP Metals of Solid Waste Samples

According to C.F.R. 261.24, solid waste having concentrations above TCLP metals regulatory levels characterizes that solid waste as hazardous waste for toxicity (D008). Three out of five solid waste samples analyzed for TCLP metals verified the characteristic of a hazardous waste for toxicity (D008). LFS-SW-006 (lead [Pb]=34 mg/L, cadmium [Cd]=2.3 mg/L), LFS-SW-008 (Pb=30 mg/L, Cd=2.9 mg/L), and LFS-SW-009 (Pb=30 mg/L, Cd=2 mg/L), exceeded TCLP metals regulatory levels for lead (5 mg/L) and cadmium (1 mg/L).

4.2.3 Metals of Solid Waste Samples

Due to the matrix of the solid waste sample submitted, LFS-SW-007 was analyzed as a waste dilution for metals instead of TCLP metals. Analytical data indicated results for LFS-SW-007 of 31,200 mg/kg for lead, exceeding the EPA residential RML of 400 mg/kg, and 662 mg/kg for cadmium, exceeding the EPA residential RML of 210 mg/kg.

4.3 FOUNDRY SAND RESULTS

A total of four foundry samples were collected. All four foundry sand samples collected were analyzed for TCLP metals.

4.3.1 TCLP Metals of Foundry Sand Samples

According to C.F.R. 261.24, solid waste having concentrations above TCLP metals regulatory levels characterizes that solid waste as hazardous waste for toxicity (D008). Three out of four foundry sand samples analyzed for TCLP metals verified the characteristic of a hazardous waste for toxicity (D008). LFS-FS-001 (Pb=9.3 mg/L), LFS-FS-002 (Pb=12 mg/L), and LFS-FS-003 (Pb=6.9 mg/L), exceeded TCLP metals regulatory levels for lead (5 mg/L).

4.4 BULK PCB OIL RESULTS

A total of 2 bulk oil samples were collected. These samples were collected from the two transformers on the fourth floor that were unlabeled. Both bulk oil samples collected were analyzed for PCBs. Both bulk oil samples collected did not exceed EPA residential removal management levels (RMLs). The two

transformers that were labeled as "contains PCBs" could not be safely opened by the sample team, thus they were not sampled.

5.0 CONCLUSIONS

Analytical results confirmed the presence of hazardous substances, pollutants, or contaminants at the Site as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), including the presence of corrosives, ignitable hazards, and elevated levels of metals waste. There is a potential for the migration of these materials into the environment and on-site storm water drains due to a leaking roof and broken windows. Commercial and light industrial areas are located within 100 feet of the Site and evidence of trespassing and vandalism were documented during the site investigation. These factors indicate potential exposure pathways to nearby human receptors, including nearby commercial areas from the hazardous substances, pollutants, or contaminants on-site. Future trespassers could cause an accidental or intentional release of hazardous materials and their contact with hazardous materials is also possible. Potential exposure could occur through each of these migration pathways.

6.0 REFERENCES

- Tetra Tech Inc. 2008. Standard Operating Procedure No. 024, Revision 1, "Recording of Notes in Field Logbooks."
- Tetra Tech In. 2000. Standard Operating Procedure No. 008-02, "Containerized Liquid, Sludge, and Slurry Sampling."
- Tetra Tech Inc. 1999. Standard Operating Procedure No. 007-02, "Bulk Materials Sampling"
- Tetra Tech Inc. 2009b. Standard Operating Procedure No. 009, Revision 4, "Surface Water Sampling."
- Tetra Tech Inc. 2016. Quality Assurance Project Plan for START. June. Prepared for EPA under Contract No. EP-S5-13-01.

APPENDIX A SITE FIGURES

C:\temp\Projects\T1130064\GIS\mxds\Proposed_Sampling\Fig1_Site_Location_v20170420.mxd

File Path:



Legend

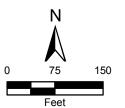
Manhole Cover - UST (oil)

UST Location

Building Footprint

Aerial Source: ESRI World Imagery Service / USDA FSA NAIP2015

EPA Contract No.: EP-S5-13-01 TDD No.: 0001/S05-0001-1703-005



Lunkenheimer Foundary Site - RS 1519 Tremont Street, Cincinnati, Ohio

Figure 2 Site Footprint

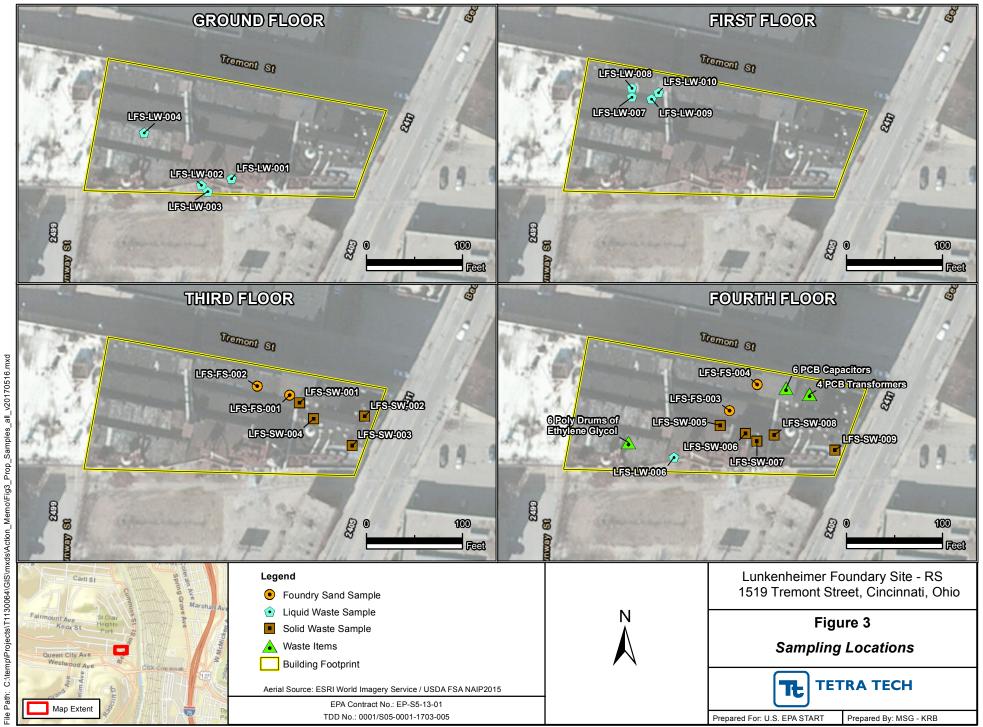


Prepared For: U.S. EPA START

Prepared By: MSG - KRB

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File Path: C:\temp\Projects\T1130064\GIS\mxds\Propos



APPENDIX B TABLES

TABLE 1
FOUNDRY SAND AND SOLID WASTE ANALYTICAL RESULTS

		San	nple Number :	LFS-FS-00	1-042517	LFS-FS-00	2-042517	LFS-FS-00	3-042517	LFS-FS-00	4-042517	LFS-SW-00	01-042517
			Matrix :	Foundry Sand		Found	Foundry Sand		Foundry Sand		ry Sand	Solid	
			Laboratory:	CT Laboratories		CT Labo	ratories	CT Labo	ratories	CT Laboratories		CT Laboratories	
			Sample Date:	4/25,	/2017	4/25,	/2017	4/25/	/2017	4/25,	/2017	4/25/	2017
Analyte	CAS#	Analytical Method	Regulatory Level	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier
Metals (mg/L)													
Arsenic	7440-38-2	SW 6010	5ª	0.011	J	0.004	U	0.004	U	0.004	U	NS	
Barium	7440-39-3	SW 6010	100 ^a	0.26		0.25		0.26		0.081		NS	
Cadmium	7440-43-9	SW 6010	1 ^a	0.15		0.1		0.14		0.12		NS	
Chromium	7440-47-3	SW 6010	5ª	0.01		0.0035	J	0.008		0.12		NS	
Lead	7439-92-1	SW 6010	5ª	9.3		12		6.9		0.19		NS	
Selenium	7439-97-6	SW 6010	0.2 ^a	0.0022	U	0.0022	U	0.0022	U	0.0022	U	NS	
Silver	7782-49-2	SW 6010	1 ^a	0.0007	U	0.0007	U	0.0007	U	0.0024	J	NS	
Mercury	7440-22-4	SW7470A	5 ^a	0.00003	U	0.00003	U	0.000093	J	0.00003	U	NS	
Other													
рН	рН	SW9045	≤2 or ≥12.5 S.U. ^b	NS		NS		NS		NS		11	J
Flashpoint	FLASHPT	SW1010	<140 °F°	NS		NS		NS		NS		NS	

J

mg/L Milligram per liter
NS Not sampled

The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

U The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).

Sample result exceeds regulatory level.

^a EPA Title 40 Code of Federal Regulations (CFR) Section 261.24 maximum concentration of contaminant for the hazardous waste toxicity characteristic.

EPA Title 40 Code of Federal Regulations (CFR) Section 261.22 maximum pH standard for hazardous waste corrosivity characteristic.

EPA Title 40 Code of Federal Regulations (CFR) Section 261.21 maximum flashpoint temperature standard for hazardous waste ignitability characteristic.

Sample dilution factor of 10

TABLE 1
FOUNDRY SAND AND SOLID WASTE ANALYTICAL RESULTS

		San	nple Number :	LFS-SW-001-04	2517-DUP	LFS-SW-0	02-042517	LFS-SW-00	03-042517	LFS-SW-00	04-042517	LFS-SW-004-04	12517-DUP
			Matrix :	Solid		Sc	Solid		Solid		Solid		ı
			Laboratory:	CT Laboratories		CT Labo	ratories	CT Labo	ratories	CT Labo	ratories	CT Laboratories	
			Sample Date:	: 4/25/2017		4/25,	/2017	4/25,	/2017	4/25/	/2017	4/25/2017	
Analyte	CAS#	Analytical Method	Regulatory Level	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier
Metals (mg/L)													
Arsenic	7440-38-2	SW 6010	5 ^a	NS		NS		NS		0.0099	J	0.0052	J
Barium	7440-39-3	SW 6010	100 ^a	NS		NS		NS		0.16		0.16	
Cadmium	7440-43-9	SW 6010	1 ^a	NS		NS		NS		0.00043	J	0.0029	
Chromium	7440-47-3	SW 6010	5 ^a	NS		NS		NS		0.0006	U	0.0006	U
Lead	7439-92-1	SW 6010	5 ^a	NS		NS		NS		0.74		0.56	
Selenium	7439-97-6	SW 6010	0.2 ^a	NS		NS		NS		0.0022	U	0.0022	U
Silver	7782-49-2	SW 6010	1 ^a	NS		NS		NS		0.0012	J	0.0007	J
Mercury	7440-22-4	SW7470A	5 ^a	NS		NS		NS		0.00003	U	0.00003	U
Other	Other												
рН	рН	SW9045	≤2 or ≥12.5 S.U. ^b	10		11	J	8		NS		NS	
Flashpoint	FLASHPT	SW1010	<140 °F°	NS		NS		NS		NS		NS	

mg/L Milligram per liter
NS Not sampled

The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

U The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).

Sample result exceeds regulatory level.

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EPA Title 40 Code of Federal Regulations (CFR) Section 261.21 maximum flashpoint temperature standard for hazardous waste ignitability characteristic.

d Sample dilution factor of 10

TABLE 1
FOUNDRY SAND AND SOLID WASTE ANALYTICAL RESULTS

		San	nple Number :	LFS-SW-00	05-042517	LFS-SW-00	06-042517	LFS-SW-0	08-042517	LFS-SW-008-04	42517-DUP	LFS-SW-0	09-042517
			Matrix :	Solid		So	Solid		lid	Solid	d	So	olid
			Laboratory:	CT Laboratories		CT Labo	ratories	CT Labo	ratories	CT Laboratories		CT Laboratories	
			Sample Date:	4/25/	/2017	4/25,	/2017	4/25,	/2017	4/25/2	017	4/25/2017	
Analyte	CAS#	Analytical Method	Regulatory Level	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier
Metals (mg/L)													
Arsenic	7440-38-2	SW 6010	5 ^a	0.011	J	0.01	J	0.0074	J	0.0077	J	0.0079	J
Barium	7440-39-3	SW 6010	100 ^a	0.017		0.04		0.066		0.083		0.052	
Cadmium	7440-43-9	SW 6010	1 ^a	0.81 ^d		2.3 ^d		2.9 ^d		2.7 ^d		2 ^d	
Chromium	7440-47-3	SW 6010	5 ^a	0.0072		0.0006	U	0.0012	J	0.0013	J	0.00077	J
Lead	7439-92-1	SW 6010	5 ^a	4.7		34		30		27		30	
Selenium	7439-97-6	SW 6010	0.2 ^a	0.013		0.037		0.043		0.037		0.027	
Silver	7782-49-2	SW 6010	1 ^a	0.0014	J	0.0035	J	0.0032	J	0.0031	J	0.0031	J
Mercury	7440-22-4	SW7470A	5 ^a	0.00098		0.0029		0.0026		0.0022		0.0035	
Other	Other												
рН	рН	SW9045	≤2 or ≥12.5 S.U. ^b	NS		NS		NS		NS		NS	
Flashpoint	FLASHPT	SW1010	<140 °F°	NS		NS		NS		NS		NS	

mg/L Milligram per liter
NS Not sampled

The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

U The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).

Sample result exceeds regulatory level.

EPA Title 40 Code of Federal Regulations (CFR) Section 261.24 maximum concentration of contaminant for the hazardous waste toxicity characteristic.

EPA Title 40 Code of Federal Regulations (CFR) Section 261.22 maximum pH standard for hazardous waste corrosivity characteristic.

EPA Title 40 Code of Federal Regulations (CFR) Section 261.21 maximum flashpoint temperature standard for hazardous waste ignitability characteristic.

d Sample dilution factor of 10

TABLE 2
BULK OIL AND LIQUID WASTE ANALYTICAL RESULTS

		Sar	mple Number :	LFS-BO-0	01-042517	LFS-BO-0	02-042517	LFS-SW-0	07-042517	LFS-LW-0	01-042517	LFS-LW-0	02-042517
			Matrix :	Bul	k Oil	Bul	k Oil	Sc	olid	Liq	juid	Liq	juid
			Laboratory:	CT Labo	oratories	CT Labo	oratories	CT Labo	oratories	CT Labo	ratories	CT Labo	ratories
			Sample Date:	4/25	/2017	4/25	/2017	4/25	/2017	4/25	/2017	4/25	/2017
Compound	CAS#	Analytical Method	Screening Levels	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier
Polychlorinated Bi	phenyls (PCB) (μg/kg)											
Aroclor-1016	12674-11-2	SW8082	12000 ^a	500 ^d	U	500 ^d	U	NS		NS		NS	
Aroclor-1221	11104-28-2	SW8082	20000 ^a	700 ^d	U	700 ^d	U	NS		NS		NS	
Aroclor-1232	11141-16-5	SW8082	17000 ^a	900 ^d	U	900 ^d	U	NS		NS		NS	
Aroclor-1242	53469-21-9	SW8082	23000 ^a	700 ^d	U	700 ^d	U	NS		NS		NS	
Aroclor-1248	12672-29-6	SW8082	23000 ^a	700 ^d	U	700 ^d	U	NS		NS		NS	
Aroclor-1254	11097-69-1	SW8082	3500 ^a	900 ^d	U	900 ^d	U	NS		NS		NS	
Aroclor-1260	11096-82-5	SW8082	24000 ^a	600 ^d	U	600 ^d	U	NS		NS		NS	
Aroclor-1262	37324-23-5	SW8082	NC	700 ^d	U	700 ^d	U	NS		NS		NS	
Aroclor-1268	11100-14-4	SW8082	NC	500 ^d	U	500 ^d	U	NS		NS		NS	
Metals (mg/kg)													
Arsenic	7440-38-2	SW 6010	68 ^a	NS		NS		20.5 ^e		NS		NS	
Barium	7440-39-3	SW 6010	46,000 ^a	NS		NS		22.7 ^e		NS		NS	
Cadmium	7440-43-9	SW 6010	210 ^a	NS		NS		662 ^f		NS		NS	
Chromium	7440-47-3	SW 6010	NC	NS		NS		14.1 ^e		NS		NS	
Lead	7439-92-1	SW 6010	400 ^a	NS		NS		31,200 ^f		NS		NS	
Selenium	7439-97-6	SW 6010	1,200 ^a	NS		NS		23.3 ^e		NS		NS	
Silver	7782-49-2	SW 6010	1,200 ^a	NS		NS		65.7 ^f		NS		NS	
Mercury	7440-22-4	SW7471B	33 ^a	NS		NS		0.42	J	NS		NS	
Other													
рН	рН	SW9045	≤2 or ≥12.5 S.U. ^b	NS		NS		NS		14	J	NS	
Flashpoint	FLASHPT	SW1010	<140 °F°	NS		NS		NS		NS		>140	

μg/kg Microgram per kilogram mg/kg Milligram per kilogram

NC No criteria
NS Not sampled

J The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).

Sample concentration exceeds screening level

EPA Removal Management Levels (May 2016) for residential soil are based on a target risk of 1.0 E-04 for carcinogens and a target hazard quotient of 3 for non-

carcinogens. RMLs are available at: http://www2.epa.gov/risk/regional-removal-management-levels-chemicals-rmls

EPA Title 40 Code of Federal Regulations (CFR) Section 261.22 maximum pH standard for hazardous waste corrosivity characteristic.

EPA Title 40 Code of Federal Regulations (CFR) Section 261.21 maximum flashpoint temperature standard for hazardous waste ignitability characteristic.

Sample dilution factor of 10
Sample dilution factor of 3

f Sample dilution factor of 100

TABLE 2
BULK OIL AND LIQUID WASTE ANALYTICAL RESULTS

		Sar	mple Number :	LFS-LW-0	03-042517	LFS-LW-0	04-042517	LFS-LW-0	05-042517	LFS-LW-0	06-042517	LFS-LW-0	07-042517
			Matrix :	Lic	ιuid	Liq	uid	Liq	uid	Liq	juid	Liq	ιuid
			Laboratory:	CT Labo	oratories	CT Labo	ratories	CT Labo	ratories	CT Labo	ratories	CT Labo	oratories
			,										
		1	Sample Date:	4/25	/2017	4/25	/2017	4/25,	/2017	4/25	/2017	4/25	/2017
Compound	CAS#	Analytical Method	Screening Levels	Value	Tt Qualifier								
Polychlorinated Bi	iphenyls (PCB) (μg/kg)											
Aroclor-1016	12674-11-2	SW8082	12000 ^a	NS									
Aroclor-1221	11104-28-2	SW8082	20000 ^a	NS									
Aroclor-1232	11141-16-5	SW8082	17000 ^a	NS									
Aroclor-1242	53469-21-9	SW8082	23000 ^a	NS									
Aroclor-1248	12672-29-6	SW8082	23000 ^a	NS									
Aroclor-1254	11097-69-1	SW8082	3500 ^a	NS									
Aroclor-1260	11096-82-5	SW8082	24000 ^a	NS									
Aroclor-1262	37324-23-5	SW8082	NC	NS									
Aroclor-1268	11100-14-4	SW8082	NC	NS									
Metals (mg/kg)													
Arsenic	7440-38-2	SW 6010	68 ^a	NS									
Barium	7440-39-3	SW 6010	46,000 ^a	NS									
Cadmium	7440-43-9	SW 6010	210 ^a	NS									
Chromium	7440-47-3	SW 6010	NC	NS									
Lead	7439-92-1	SW 6010	400 ^a	NS									
Selenium	7439-97-6	SW 6010	1,200 ^a	NS									
Silver	7782-49-2	SW 6010	1,200 ^a	NS									
Mercury	7440-22-4	SW7471B	33 ^a	NS									
Other					•								
рН	рН	SW9045	≤2 or ≥12.5 S.U. ^b	NS		NS		12	J	NS		0.1	J
Flashpoint	FLASHPT	SW1010	<140 °F°	>140		>140		NS		120.6		NS	

μg/kg Microgram per kilogram mg/kg Milligram per kilogram

NC No criteria
NS Not sampled

The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).

Sample concentration exceeds screening level

EPA Removal Management Levels (May 2016) for residential soil are based on a target risk of 1.0 E-04 for carcinogens and a target hazard quotient of 3 for non-

carcinogens. RMLs are available at: http://www2.epa.gov/risk/regional-removal-management-levels-chemicals-rmls

EPA Title 40 Code of Federal Regulations (CFR) Section 261.22 maximum pH standard for hazardous waste corrosivity characteristic.

EPA Title 40 Code of Federal Regulations (CFR) Section 261.21 maximum flashpoint temperature standard for hazardous waste ignitability characteristic.

Sample dilution factor of 10
Sample dilution factor of 3

f Sample dilution factor of 100

TABLE 2
BULK OIL AND LIQUID WASTE ANALYTICAL RESULTS

		Sar	nple Number :	LFS-LW-0	08-042517	LFS-LW-0	09-042517	LFS-LW-0	10-042517
			Matrix :	liq	uid	Lic	Juid	Lic	Juid
			Laboratory:	CT Laboratories		CT Laboratories		CT Laboratories	
			Sample Date:	4/25/2017		4/25/2017		4/25/2017	
Compound	CAS#	Analytical Method	Screening Levels	Value	Tt Qualifier	Value	Tt Qualifier	Value	Tt Qualifier
Polychlorinated Bi	phenyls (PCB) (μg/kg)					•		
Aroclor-1016	12674-11-2	SW8082	12000 ^a	NS		NS		NS	
Aroclor-1221	11104-28-2	SW8082	20000 ^a	NS		NS		NS	
Aroclor-1232	11141-16-5	SW8082	17000 ^a	NS		NS		NS	
Aroclor-1242	53469-21-9	SW8082	23000 ^a	NS		NS		NS	
Aroclor-1248	12672-29-6	SW8082	23000 ^a	NS		NS		NS	
Aroclor-1254	11097-69-1	SW8082	3500 ^a	NS		NS		NS	
Aroclor-1260	11096-82-5	SW8082	24000 ^a	NS		NS		NS	
Aroclor-1262	37324-23-5	SW8082	NC	NS		NS		NS	
Aroclor-1268	11100-14-4	SW8082	NC	NS		NS		NS	
Metals (mg/kg)									
Arsenic	7440-38-2	SW 6010	68ª	NS		NS		NS	
Barium	7440-39-3	SW 6010	46,000 ^a	NS		NS		NS	
Cadmium	7440-43-9	SW 6010	210 ^a	NS		NS		NS	
Chromium	7440-47-3	SW 6010	NC	NS		NS		NS	
Lead	7439-92-1	SW 6010	400 ^a	NS		NS		NS	
Selenium	7439-97-6	SW 6010	1,200 ^a	NS		NS		NS	
Silver	7782-49-2	SW 6010	1,200 ^a	NS		NS		NS	
Mercury	7440-22-4	SW7471B	33 ^a	NS		NS		NS	
Other									
рН	рН	SW9045	≤2 or ≥12.5 S.U. ^b	0.1	J	J		NS	
Flashpoint	FLASHPT	SW1010	<140 °F°	NS		>140		100.5	

µg/kg Microgram per kilogram mg/kg Milligram per kilogram

NC No criteria NS Not sampled

The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

U The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).

Sample concentration exceeds screening level

EPA Removal Management Levels (May 2016) for residential soil are based on a target risk of 1.0 E-04 for carcinogens and a target hazard quotient of 3 for non-carcinogens. RMLs are available at: http://www2.epa.gov/risk/regional-removal-management-levels-chemicals-rmls

EPA Title 40 Code of Federal Regulations (CFR) Section 261.22 maximum pH standard for hazardous waste corrosivity characteristic.

EPA Title 40 Code of Federal Regulations (CFR) Section 261.21 maximum flashpoint temperature standard for hazardous waste ignitability characteristic.

d Sample dilution factor of 10
e Sample dilution factor of 3
f Sample dilution factor of 100

APPENDIX C PHOTOGRAPHIC DOCUMENTATION

	Sample Summary Lunkenheimer Foundry Site Cincinnati, Hamilton County, Ohio										
Sample	LFS-LW-001-042517	LFS-LW-006-042517									
Designation											
Container Type	Steel Drum	Metal Container									
Matrix	Liquid	Liquid									
Label Information	Apr 11, 2017, 14:11:12 39.12676591,-84.54554826	Magnus Simple Apr 25, 2017, 11:46:22 39,12687651,-84.54621370									
	Field Screening Resu	ılts									
Multi-Rae VOCs Reading	N/A	N/A									
pН	13-14 SU	N/A									
	Analytical Results	8									
pН	14 SU >12.5 (Caustic)	N/A									
Flashpoint	N/A	120.6 °F									
		(Less than 140°F = Flammable)									

LFS Lunkenheimer Foundry Site VOCs Volatile Organic Compounds

ppb parts per billion
N/A not analyzed
°F Fahrenheit
SU Standard Units

U Analyzed but not detected above the method detection limit

	Sample Summary Lunkenheimer Foundry Site Cincinnati, Hamilton County, Ohio										
Sample	LFS-LW-007-042517	LFS-LW-008-042517									
Designation											
Container	Glass Beaker	Glass Beaker									
Type											
Matrix	Liquid	Liquid									
Label Information	N/A Apr 25, 2017, 13:47:15 39.12724805,-84.54625972	N/A Apr 25, 2017, 14:02:17 39.12724970,-84.54626066									
	Field Screening Res	sults									
Multi-Rae VOCs Reading	N/A	N/A									
рН	2 SU	2 SU									
Lab Results											
Flashpoint	N/A	N/A									
pН	<0.1 SU	<0.1 SU									
	Less than 2.5 pH (Corrosive)	Less than 2.5 pH (Corrosive)									

LFS Lunkenheimer Foundry Site VOCs Volatile Organic Compounds N/A not analyzed

N/A not analyzed °F Fahrenheit SU Standard Units

U Analyzed but not detected above the method detection limit

	Sample Summar Lunkenheimer Found Cincinnati, Hamilton Co	lry Site		
Sample	LFS-LW-010-042517	LFS-SW-00	6-042517	
Designation				
Container	Metal 5 gallon container	Pile on foun	dry line equip	ment
Type				
Matrix	Liquid	Solids		
Label Information	Butyl Acetate Apr 25, 2017, 14:02:01 39.12730297, -84.54650329	N/A Apt 25, 2007, 10, 49:53 39, 468X002, 84,54568	35	
	Field Screening Res			
Multi-Rae VOCs Reading	N/A	XRF Readin	$\log - 3.88\%$ fo	r Lead
рН	N/A	N/A		
	Lab Results			
Flashpoint	100.5 °F	Compound	TCLP	Prelim
	(Less than 140°F = Flammable)		Regulatory Level	Results
		Lead	5 mg/L	34 mg/L

LFS Lunkenheimer Foundry Site VOCs Volatile Organic Compounds

N/A not analyzed °F Fahrenheit SU Standard Units

U Analyzed but not detected above the method detection limit

Sample Summary Lunkenheimer Foundry Site Cincinnati, Hamilton County, Ohio					
Sample Designation	LFS-SW-007-042517		LFS-SW-008-042517		
Container Type	Pile on Foundry Equipment		Pile on Foundry Equipment		
Matrix	Solids		Solids		
Label Information	N/A Apr 25, 2017, 11:50:37 39.12675158, 84.54558145		N/A Apr 25, 2017, 11-51-12 39,12561978, 94-54546486		
Field Screening Results					
XRF Reading	2.58% for Lead		1.86% for Lead		
Lab Results					
Compound	TCLP Regulatory Level	Preliminary Results	TCLP Regulatory Level	Preliminary Results	
Arsenic	5 mg/L	20.5 mg/L	5 mg/L	-	
Cadmium	1 mg/L	662 mg/L	1 mg/L	2.9 mg/L	
Chromium	5 mg/L	14.1 mg/L	5 mg/L	-	
Lead	5 mg/L	31,200 mg/L	5 mg/L	30 mg/L	
Selenium	1 mg/L	23.3 mg/L	1 mg/L		
Silver	5 mg/L	65.7 mg/L	5 mg/L	-	

LFS Lunkenheimer Foundry Site VOCs Volatile Organic Compounds

ppm parts per million N/A not analyzed SU Standard Units

TCLP Toxicity Characteristic Leaching Procedure

U Analyzed but not detected above the method detection limit

Samples were submitted to CT laboratory for analysis under TDD No. S05-0001-1703-005. Sample LFS-SW-007-042517 was ran as a waste dilution due to the sample matrix. Photographed by Karl Schultz

Sample Summary Lunkenheimer Foundry Site Cincinnati, Hamilton County, Ohio

Sample	LFS-SW-008-dup	LFS-SW-009
Designation		
Container	Pile on Foundry Equipment	Metal Container
Type		
Matrix	Solids	Solids
Label	N/A	N/A

Label Information





Field Screening Results

XRF Reading	1.86% for Lead		3.39 % for Lead		
Lab Results					
Compound	TCLP Regulatory Level	Preliminary Results	TCLP Regulatory Level	Preliminary Results	
Arsenic	5 mg/L	-	5 mg/L	-	
Cadmium	1 mg/L	2.7 mg/L	1 mg/L	2 mg/L	
Chromium	5 mg/L	-	5 mg/L	-	
Lead	5 mg/L	27 mg/L	5 mg/L	30 mg/L	
Selenium	1 mg/L	-	1 mg/L	-	
Silver	5 mg/L	-	5 mg/L	-	

Notes:

LFS Lunkenheimer Foundry Site

 $\begin{array}{ll} ppm & parts \ per \ million \\ N/A & not \ analyzed \end{array}$

TCLP Toxicity Characteristic Leaching Procedure

U Analyzed but not detected above the method detection limit

Sample Summary **Lunkenheimer Foundry Site** Cincinnati, Hamilton County, Ohio LFS-FS-001-042517 Sample LFS-FS-002-042517 Designation Container Pile on Foundry Equipment Pile on Foundry Floor Type Foundry Sand Foundry Sand Matrix N/A Label Information

Field Screening Results					
XRF Reading	1250 ppm for Lead		1177 ppm for Lead		
Lab Results					
Compound	TCLP Regulatory Level	Preliminary Results	TCLP Regulatory Level	Preliminary Results	
Arsenic	5 mg/L	-	5 mg/L	-	
Cadmium	1 mg/L	-	1 mg/L	-	
Chromium	5 mg/L	-	5 mg/L	-	
Lead	5 mg/L	9.3 mg/L	5 mg/L	12 mg/L	
Selenium	1 mg/L	-	1 mg/L	-	
Silver	5 mg/L	-	5 mg/L	-	

Notes:

LFS Lunkenheimer Foundry Site

ppm parts per million N/A not analyzed

TCLP Toxicity Characteristic Leaching Procedure

U Analyzed but not detected above the method detection limit

Sample Summary Lunkenheimer Foundry Site Cincinnati, Hamilton County, Ohio					
Sample	LFS-FS-003	,			
Designation					
Container	55-gallon Dru	ım			
Type					
Matrix	Foundry Sand				
Label Information	N/A Apr 25, 2017, 11:43:19 39.12708774, -84.54609459				
		Field Screening Res	sults		
XRF Reading					
		Lab Results	_		
Compound	TCLP Regulatory Level	Preliminary Results			
Arsenic	5 mg/L	-			
Cadmium	1 mg/L	-			
Chromium	5 mg/L	-			
Lead	5 mg/L	6.9 mg/L			
Selenium	1 mg/L	-			
Silver	5 mg/L	-			

LFS Lunkenheimer Foundry Site

parts per million ppm N/A not analyzed

TCLP

Toxicity Characteristic Leaching Procedure
Analyzed but not detected above the method detection limit U

APPENDIX D DATA VALIDATION REPORT



May 31, 2017

Mr. Steven Renninger On-Scene Coordinator U.S. Environmental Protection Agency Region 5 26 West Martin Luther King Drive Cincinnati, Ohio 45268-0001

Subject: Data Validation Report

Lunkenheimer Foundry Site EPA Contract No. EP-S5-13-01

Technical Direction Document No. S05-0001-1703-005

Document Tracking No. 1746

Dear Mr. Renninger:

Tetra Tech, Inc. (Tetra Tech) is submitting this Data Validation Report for 25 waste samples and three field duplicate samples collected at the Lunkenheimer Foundry site. The samples were collected on April 25, 2017, and were analyzed for polychlorinated biphenyls, total metals, toxicity characteristic leaching procedure metals, pH, and flashpoint by CT Laboratories. The laboratory data package was received on May 18, 2017.

Analytical data were evaluated in general accordance with the EPA *National Functional Guidelines* (NFG) for Organic Superfund Methods Data Review (January 2017) and the EPA NFG for Inorganic Superfund Data Review (January 2017).

No results were rejected. All may be used as qualified for the reasons discussed in the attachment.

If you have any questions regarding this data validation report, please call me at (312) 201-7756.

Sincerely,

START Chemist

Enclosure

cc: Kevin Scott, Tetra Tech Program Manager

Karl Schultz, Tetra Tech Project Manager

TDD File

Hang N. Elio III

ATTACHMENT 1

DATA VALIDATION REPORT CT LABORATORIES REPORT 126906

Site Name	Lunkenheimer Foundry Site	TDD No.	SOF 0001 1702 00F
Document Tracking No.	1746	IDD NO.	S05-0001-1703-005
Data Reviewer (signature and date)	Hang N. Elis III	Technical Reviewer (signature and date)	Jesaca a Vickers May 31, 2017
Laboratory Report No.	126906	Laboratory	CT Laboratories/Baraboo, Wisconsin
Analyses		nods 6010C and 7471A, ar	7-846 Method 9040C, flash point by SW-846 and toxicity characteristic leaching procedure
Samples and Matrix	25 Waste samples plus 3 field duplicates		
Field Duplicate Pairs LFS-SW-001-042517/LFS-SW-001-042517-DUP, LFS-SW-004-042517/LFS-SW-004-042517/LFS-SW-004-042517-DUP		LFS-SW-004-042517, and	
Field Blanks	None		

INTRODUCTION

This checklist summarizes the Stage 4 validation performed on the subject laboratory report, in accordance with the U.S. Environmental Protection Agency (EPA) *Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use* (January 2009). Analytical data were evaluated in general accordance with the EPA *National Functional Guidelines (NFG) for Organic Superfund Methods Data Review* (January 2017) and the EPA *NFG for Inorganic Superfund Methods Data Review* (January 2017).

OVERALL EVALUATION

No results were rejected, but several were qualified. All may be used, as qualified.

Data completeness:

Within Criteria	Exceedance/Notes
Υ	



Sample preservation, receipt, and holding times:

Within Criteria	Exceedance/Notes
Υ	

Instrument Performance Checks:

Within Criteria	Exceedance/Notes
NA	

Initial Calibration:

Within Criteria	Exceedance/Notes
Υ	

Continuing Calibration:

Within Criteria	Exceedance/Notes
Υ	

Calibration Verification:

Within Criteria	Exceedance/Notes
Υ	

Method blanks:

Within Criteria	Exceedance/Notes
N	Many of the metals calibration and method blanks yielded low concentrations of one or more of the analytes. However, all associated field sample results were either non-detect or much greater than the blanks; therefore, no qualifications were applied.



Field blanks:

Within Criteria	Exceedance/Notes
NA	

Interference Check Samples (ICS) (ICP metals only):

Within Criteria	Exceedance/Notes
Υ	

System monitoring compounds (surrogates and labeled compounds):

Within Criteria	Exceedance/Notes
N	The initial (undiluted) analyses of the PCB extracts yielded surrogate peaks outside the retention time windows, indicating significant matrix interference. The extracts were analyzed at dilutions that yielded acceptable surrogate results. Only the diluted results were reported; therefore, no qualifications were applied.

MS/MSD:

Within Criteria	Exceedance/Notes
N	Recoveries and relative percent differences (RPDs) of mercury from the analyses performed on sample LFS-SW-007-042517 and of cadmium and lead from the analyses performed on sample LFS-FS-003-042417 could not be determined because field samples contained more than four times the spike concentrations. No qualifications were applied for these data gaps. Selenium yielded excessive recoveries from sample LFS-FS-003-042517. Because selenium was not detected in the unspiked sample, no qualification was applied.

Post digestion spikes:

Within	Fyeodomes/Netes
Criteria	Exceedance/Notes
NA	



Serial dilutions:

Within Criteria	Exceedance/Notes
Υ	

Laboratory duplicates:

Within Criteria	Exceedance/Notes
N	The RPD of mercury from the analysis performed on sample LFS-SW-007-042517 exceeded the acceptance limit; therefore, the mercury result for this sample was qualified as estimated (flagged "J").

Field duplicates:

Within Criteria	Exceedance/Notes
N	The TCLP cadmium field duplicate result in the pair from LFS-SW-004-042517 yielded about 7 times the concentration in the primary sample, with an absolute difference well over the reporting limit. Due to the uncertainty in the true concentration of TCLP cadmium at that location, the results for that pair were qualified as estimated (flagged "J").

LCSs/LCSDs:

Within Criteria	Exceedance/Notes
Υ	

Sample dilutions:

Within Criteria	Exceedance/Notes
Υ	PCB extracts were analyzed at 10-fold dilutions to minimize matrix interference, thus raising detection and reporting limits. Additionally, several TCLP cadmium results and various total metals results were analyzed at 3- to 100-fold dilutions to place the results within the calibration range. No qualifications were applied.



Re-extraction and reanalysis:

Within Criteria	Exceedance/Notes
NA	

Second column confirmation (GC and HPLC analyses only):

Within Criteria	Exceedance/Notes
NA	No PCBs were detected.

Internal Standards:

Within Criteria	Exceedance/Notes
Υ	

Target analyte identification:

Within Criteria	Exceedance/Notes
NA	

Analyte quantitation and MDLs/RLs:

Within Criteria	Exceedance/Notes
N	Some detected results were less than their sample reporting limits and were flagged "J" by the laboratory to indicate that they are estimated.
	Most pH results were outside CT's calibration range of 4 to 10. Both acidic results (measured as zero, but possibly negative) and alkaline results (reported as high as 14, but possibly higher) outside the 4 to 10 range were qualified as estimated (flagged "J").



Tentatively identified compounds:

Within Criteria	Exceedance/Notes
NA	

System performance and instrument stability:

Within Criteria	Exceedance/Notes
Υ	

Other [specify]:

Within Criteria	Exceedance/Notes
NA	



Overall Qualifications:

See results summary pages attached for changes to the laboratory qualifiers based upon this validation. The following is a list of qualifiers and definitions that may be used for the validation of this data package:

J	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.
J+	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased high.
J-	The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased low.
NJ	The analysis indicates the presence of an analyte that has been "tentatively identified" and the associated value is the approximate concentration of the analyte in the sample.
R	The sample result is rejected as unusable due to serious deficiencies in one or more quality control criteria. The analyte may or may not be present in the sample.
U	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit).
UJ	The analyte was analyzed for, but was not detected at or above the associated value (reporting limit), which is considered approximate due to deficiencies in one or more quality control criteria.



Sample ID	Lab ID Analyte	Lab result Lab Qualifier	DL I	RL	DF Units	Val. Results Val. Qualifiers
LFS-BO-001-042517	860099 Aroclor-1016	500 UV	500	3000	10 ug/kg	3000 U
LFS-BO-001-042517	860099 Aroclor-1221	700 UV	700	3000	10 ug/kg	3000 U
LFS-BO-001-042517	860099 Aroclor-1232	900 UV	900	3000	10 ug/kg	3000 U
LFS-BO-001-042517	860099 Aroclor-1242	700 UV	700	3000	10 ug/kg	3000 U
LFS-BO-001-042517	860099 Aroclor-1248	700 UV	700	3000	10 ug/kg	3000 U
LFS-BO-001-042517	860099 Aroclor-1254	900 UV	900	3000	10 ug/kg	3000 U
LFS-BO-001-042517	860099 Aroclor-1260	600 UV	600	3000	10 ug/kg	3000 U
LFS-BO-001-042517	860099 Aroclor-1262	700 UV	700	3000	10 ug/kg	3000 U
LFS-BO-001-042517	860099 Aroclor-1268	500 UV	500	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1016	500 UV	500	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1221	700 UV	700	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1232	900 UV	900	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1242	700 UV	700	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1248	700 UV	700	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1254	900 UV	900	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1260	600 UV	600	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1262	700 UV	700	3000	10 ug/kg	3000 U
LFS-BO-002-042517	860100 Aroclor-1268	500 UV	500	3000	10 ug/kg	3000 U
LFS-FS-001-042517	860118 Arsenic	0.011 J	0.004	0.024	1 mg/L	0.011 J
LFS-FS-001-042517	860118 Barium	0.26	0.00029	0.0018	1 mg/L	0.26
LFS-FS-001-042517	860118 Cadmium	0.15	0.0003	0.002	1 mg/L	0.15
LFS-FS-001-042517	860118 Chromium	0.01	0.0006	0.004	1 mg/L	0.01
LFS-FS-001-042517	860118 Lead	9.3 B	0.0014	0.004	1 mg/L	9.3
LFS-FS-001-042517	860118 Selenium	0.0022 U	0.0022	0.013	1 mg/L	0.013 U
LFS-FS-001-042517	860118 Silver	0.0007 U	0.0007	0.004	1 mg/L	0.004 U
LFS-FS-001-042517	860118 Mercury	0.00003 U	0.00003	0.00012	1 mg/L	0.00012 U
LFS-FS-002-042517	860119 Arsenic	0.004 U	0.004	0.024	1 mg/L	0.024 U
LFS-FS-002-042517	860119 Barium	0.25	0.00029	0.0018	1 mg/L	0.25
LFS-FS-002-042517	860119 Cadmium	0.1	0.0003	0.002	1 mg/L	0.1
LFS-FS-002-042517	860119 Chromium	0.0035 J	0.0006	0.004	1 mg/L	0.0035 J
LFS-FS-002-042517	860119 Lead	12 B	0.0014	0.004	1 mg/L	12
LFS-FS-002-042517	860119 Selenium	0.0022 U	0.0022	0.013	1 mg/L	0.013 U
LFS-FS-002-042517	860119 Silver	0.0007 U	0.0007	0.004	1 mg/L	0.004 U

Sample ID	Lab ID Analyte	Lab result Lab Qualifier	DL	RL	DF Units	Val. Results Val. Qualifiers
LFS-FS-002-042517	860119 Mercury	0.00003 U	0.00003	0.00012	1 mg/L	0.00012 U
LFS-FS-003-042517	860120 Arsenic	0.004 U	0.004	0.024	1 mg/L	0.024 U
LFS-FS-003-042517	860120 Barium	0.26	0.00029	0.0018	1 mg/L	0.26
LFS-FS-003-042517	860120 Cadmium	0.14	0.0003	0.002	1 mg/L	0.14
LFS-FS-003-042517	860120 Chromium	0.008	0.0006	0.004	1 mg/L	0.008
LFS-FS-003-042517	860120 Lead	6.9 B	0.0014	0.004	1 mg/L	6.9
LFS-FS-003-042517	860120 Selenium	0.0022 U	0.0022	0.013	1 mg/L	0.013 U
LFS-FS-003-042517	860120 Silver	0.0007 U	0.0007	0.004	1 mg/L	0.004 U
LFS-FS-003-042517	860120 Mercury	0.000093 J	0.00003	0.00012	1 mg/L	0.00012 J
LFS-FS-004-042517	860121 Arsenic	0.004 U	0.004	0.024	1 mg/L	0.024 U
LFS-FS-004-042517	860121 Barium	0.081	0.00029	0.0018	1 mg/L	0.081
LFS-FS-004-042517	860121 Cadmium	0.12	0.0003	0.002	1 mg/L	0.12
LFS-FS-004-042517	860121 Chromium	0.12	0.0006	0.004	1 mg/L	0.12
LFS-FS-004-042517	860121 Lead	0.19 B	0.0014	0.004	1 mg/L	0.19
LFS-FS-004-042517	860121 Selenium	0.0022 U	0.0022	0.013	1 mg/L	0.013 U
LFS-FS-004-042517	860121 Silver	0.0024 J	0.0007	0.004	1 mg/L	0.0024 J
LFS-FS-004-042517	860121 Mercury	0.00003 U	0.00003	0.00012	1 mg/L	0.0001 U
LFS-LW-001-042517	860088 pH	14 X	1	0.1	1 S.U.	14 J
LFS-LW-002-042517	860090 Flashpoint	>140			1 Deg. F	140 <
LFS-LW-003-042517	860091 Flashpoint	>140			1 Deg. F	140 <
LFS-LW-004-042517	860092 Flashpoint	>140			1 Deg. F	140 <
LFS-LW-005-042517	860093 pH	12 X	1	0.1	1 S.U.	12 J
LFS-LW-006-042517	860094 Flashpoint	120.6	65	65	1 Deg. F	120.6
LFS-LW-007-042517	860095 pH	0.1 UX	1	0.1	1 S.U.	0 J
LFS-LW-008-042517	860096 pH	0.1 UX	1	0.1	1 S.U.	0 J
LFS-LW-009-042517	860097 Flashpoint	>140			1 Deg. F	140 <
LFS-LW-010-042517	860098 Flashpoint	100.5	65	65	1 Deg. F	100.5
LFS-SW-001-042517	860101 pH	11 X	1	0.1	1 S.U.	11 J
LFS-SW-001-042517-DUP	860102 pH	10	1	0.1	1 S.U.	10
LFS-SW-002-042517	860103 pH	11 X	1	0.1	1 S.U.	11 J
LFS-SW-003-042517	860104 pH	8	1	0.1	1 S.U.	8
LFS-SW-004-042517	860105 Arsenic	0.0099 J	0.004	0.024	1 mg/L	0.0099 J

Sample ID	Lab ID Analyte	Lab result Lab Qualifier	DL RL	. DF Units	Val. Results Val. Qualifiers
LFS-SW-004-042517	860105 Barium	0.16	0.00029	0.0018 1 mg/L	0.16
LFS-SW-004-042517	860105 Cadmium	0.00043 J	0.0003	0.002 1 mg/L	0.00043 J
LFS-SW-004-042517	860105 Chromium	0.0006 U	0.0006	0.004 1 mg/L	0.004 U
LFS-SW-004-042517	860105 Lead	0.74 B	0.0014	0.004 1 mg/L	0.74
LFS-SW-004-042517	860105 Selenium	0.0022 U	0.0022	0.013 1 mg/L	0.013 U
LFS-SW-004-042517	860105 Silver	0.0012 J	0.0007	0.004 1 mg/L	0.0012 J
LFS-SW-004-042517	860105 Mercury	0.00003 U	0.00003 0.	.00012 1 mg/L	0.0001 U
LFS-SW-004-042517-DUP	860106 Arsenic	0.0052 J	0.004	0.024 1 mg/L	0.0052 J
LFS-SW-004-042517-DUP	860106 Barium	0.16	0.00029	0.0018 1 mg/L	0.16
LFS-SW-004-042517-DUP	860106 Cadmium	0.0029	0.0003	0.002 1 mg/L	0.0029 J
LFS-SW-004-042517-DUP	860106 Chromium	0.0006 U	0.0006	0.004 1 mg/L	0.004 U
LFS-SW-004-042517-DUP	860106 Lead	0.56 B	0.0014	0.004 1 mg/L	0.56
LFS-SW-004-042517-DUP	860106 Selenium	0.0022 U	0.0022	0.013 1 mg/L	0.013 U
LFS-SW-004-042517-DUP	860106 Silver	0.0007 J	0.0007	0.004 1 mg/L	0.0007 J
LFS-SW-004-042517-DUP	860106 Mercury	0.00003 U	0.00003 0.	.00012 1 mg/L	0.0001 U
LFS-SW-005-042517	860107 Arsenic	0.011 J	0.004	0.024 1 mg/L	0.011 J
LFS-SW-005-042517	860107 Barium	0.017	0.00029	0.0018 1 mg/L	0.017
LFS-SW-005-042517	860107 Cadmium	0.81	0.0003	0.002 1 mg/L	0.81
LFS-SW-005-042517	860107 Chromium	0.0072	0.0006	0.004 1 mg/L	0.0072
LFS-SW-005-042517	860107 Lead	4.7 B	0.0014	0.004 1 mg/L	4.7
LFS-SW-005-042517	860107 Selenium	0.013	0.0022	0.013 1 mg/L	0.013
LFS-SW-005-042517	860107 Silver	0.0014 J	0.0007	0.004 1 mg/L	0.0014 J
LFS-SW-005-042517	860107 Mercury	0.00098	0.00003 0.	.00012 1 mg/L	0.00098
LFS-SW-006-042517	860108 Arsenic	0.01 J	0.004	0.024 1 mg/L	0.01 J
LFS-SW-006-042517	860108 Barium	0.04	0.00029	0.0018 1 mg/L	0.04
LFS-SW-006-042517	860108 Cadmium	2.3	0.003	0.02 10 mg/L	2.3
LFS-SW-006-042517	860108 Chromium	0.0006 U	0.0006	0.004 1 mg/L	0.004 U
LFS-SW-006-042517	860108 Lead	34 B	0.0014	0.004 1 mg/L	34
LFS-SW-006-042517	860108 Selenium	0.037	0.0022	0.013 1 mg/L	0.037
LFS-SW-006-042517	860108 Silver	0.0035 J	0.0007	0.004 1 mg/L	0.0035 J
LFS-SW-006-042517	860108 Mercury	0.0029	0.00003 0.	.00012 1 mg/L	0.0029
LFS-SW-007-042517	860109 Arsenic	20.5	0.4	2.5 3 mg/kg	20.5
LFS-SW-007-042517	860109 Barium	22.7	0.028	0.15 3 mg/kg	22.7

Sample ID	Lab ID Analyte	Lab result Lab Qualifier	DL RL	L D	F Units	Val. Results Val. Qualifiers
LFS-SW-007-042517	860109 Cadmium	662	0.62	4.1 1	L00 mg/kg	662
LFS-SW-007-042517	860109 Chromium	14.1	0.071	0.43	3 mg/kg	14.1
LFS-SW-007-042517	860109 Lead	31200	4.1	26 1	L00 mg/kg	31200
LFS-SW-007-042517	860109 Selenium	23.3	0.19	1.2	3 mg/kg	23.3
LFS-SW-007-042517	860109 Silver	65.7	1.8	10 1	L00 mg/kg	65.7
LFS-SW-007-042517	860109 Mercury	0.42 MY	0.0022	0.0086	1 mg/kg	0.42 J
LFS-SW-008-042517	860110 Arsenic	0.0074 J	0.004	0.024	1 mg/L	0.0074 J
LFS-SW-008-042517	860110 Barium	0.066	0.00029	0.0018	1 mg/L	0.066
LFS-SW-008-042517	860110 Cadmium	2.9	0.003	0.02	10 mg/L	2.9
LFS-SW-008-042517	860110 Chromium	0.0012 J	0.0006	0.004	1 mg/L	0.0012 J
LFS-SW-008-042517	860110 Lead	30 B	0.0014	0.004	1 mg/L	30
LFS-SW-008-042517	860110 Selenium	0.043	0.0022	0.013	1 mg/L	0.043
LFS-SW-008-042517	860110 Silver	0.0032 J	0.0007	0.004	1 mg/L	0.0032 J
LFS-SW-008-042517	860110 Mercury	0.0026	0.00003 0	0.00012	1 mg/L	0.0026
LFS-SW-008-042517-DUP	860111 Arsenic	0.0077 J	0.004	0.024	1 mg/L	0.0077 J
LFS-SW-008-042517-DUP	860111 Barium	0.083	0.00029	0.0018	1 mg/L	0.083
LFS-SW-008-042517-DUP	860111 Cadmium	2.7	0.003	0.02	10 mg/L	2.7
LFS-SW-008-042517-DUP	860111 Chromium	0.0013 J	0.0006	0.004	1 mg/L	0.0013 J
LFS-SW-008-042517-DUP	860111 Lead	27 B	0.0014	0.004	1 mg/L	27
LFS-SW-008-042517-DUP	860111 Selenium	0.037	0.0022	0.013	1 mg/L	0.037
LFS-SW-008-042517-DUP	860111 Silver	0.0031 J	0.0007	0.004	1 mg/L	0.0031 J
LFS-SW-008-042517-DUP	860111 Mercury	0.0022	0.00003 0	0.00012	1 mg/L	0.0022
LFS-SW-009-042517	860112 Arsenic	0.0079 J	0.004	0.024	1 mg/L	0.0079 J
LFS-SW-009-042517	860112 Barium	0.052	0.00029	0.0018	1 mg/L	0.052
LFS-SW-009-042517	860112 Cadmium	2	0.003	0.02	10 mg/L	2
LFS-SW-009-042517	860112 Chromium	0.00077 J	0.0006	0.004	1 mg/L	0.00077 J
LFS-SW-009-042517	860112 Lead	30 B	0.0014	0.004	1 mg/L	30
LFS-SW-009-042517	860112 Selenium	0.027	0.0022	0.013	1 mg/L	0.027
LFS-SW-009-042517	860112 Silver	0.0031 J	0.0007	0.004	1 mg/L	0.0031 J
LFS-SW-009-042517	860112 Mercury	0.0035	0.00003 0	0.00012	1 mg/L	0.0035

APPENDIX E ENVIRONMENTALLY PREFERRED PRACTICES

TDD #:	S05-0001-1703-005
Site Name:	Lunkenheimer Foundry Site
Site City, State:	Cincinnati, OH
Site Project Manager:	Karl Schultz
EPA OSC:	Steve Renninger

Environmentally Preferred General Field Practices							
If a general category is not applicable, then check N/A for the category box, not for each subcategory.	N= Not Used	N/A= Not Applicable	Y = Yes Implemented	Comments Section Justify in the comments for each BMP field as to why the practice was not used, not applicable, or implemented.			
Energy							
Use of Energy Efficient Equipment							
Computer Equipment (FEMP/Energy Star)			Υ				
Installation of Electric Service		NA					
Reduce Carbon Emissions from Transportation							
Use Internet Based Meetings/Conferences			Y				
Maximize Carpooling			Υ				
Use of Local Labor/Suppliers/Waste Disposal Facilities (50 mile radius)		NA					
No idling, except for extreme weather conditions			Υ				
Use of Alternative Fuels, if available within 10 miles		NA					
Properly Inflated Tires			Y				
Email Small Files (less than 8MB)			Y				
Reusable Electronic Storage Media or the Cloud			Υ				
Wa	ater						
Use of Low Flow Sampling Pumps		NA					
v	Vaste						
Use of Local Recycling Programs		NA					
Use of Rechargeable Batteries			Υ				
Recycling – Other			Υ				
Plastic Reduction			Υ				
Reuse of Resources		NA					
Direct Push Boring		NA					
Materials							
Printing when Required							
Double-sided Printing			Υ				
100% post-consumer recycled paper			Y				

Environmentally Preferred General Field Practices								
If a general category is not applicable, then check N/A for the category box, not for each subcategory.	N= Not Used	N/A= Not Applicable	Y = Yes Implemented	Comments Section Justify in the comments for each BMP field as to why the practice was not used, not applicable, or implemented.				
Land & Ecosystems								
Minimize Disruption to Natural Vegetation		NA						
Use of Non-invasive Investigation Techniques		NA						
Environme	ntally Pr	eferred						
Green Procurement								
Environmentally Preferred Vendors	N							
Green Lodging/Hotels								
Use of Green Laboratories								